

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CIARA NOAKES, individually, and on behalf of all others similarly situated,

Plaintiff,

v.

L'OREAL U.S.A., INC.,

Defendant.

LATIFAH ABEDNEGO, individually, and on behalf of all others similarly situated,

Plaintiff,

v.

L'OREAL U.S.A., INC.,

Defendant.

LUCINDA O'DEA, individually, and on behalf of all others similarly situated,

Plaintiff,

v.

L'OREAL U.S.A., INC.,

Defendant.

ELLEN PAINTER and ROBERT HIGHTOWER, individually, and on behalf of all others similarly situated,

Plaintiffs,

CASE NO. 1:24-cv-02735-AT

CASE NO. 1:24-cv-03998-AT

CASE NO. 1:24-cv-08352-AT

CASE NO. 1:25-cv-03137-AT

v.

L'OREAL U.S.A., INC.,

Defendant.

HOLLY GROSSENBACHER, individually
and on behalf of all others similarly situated,

CASE NO. 1:25-cv-01497-AT

Plaintiff,

v.

L'OREAL USA, Inc.

Defendant.

JENNIFER SNOW, on behalf of herself, and
all others similarly situated, and the general
public,

CASE NO. 1:25-cv-03583-AT

Plaintiff,

v.

L'OREAL U.S.A., INC.,

Defendant.

JOINT STATUS UPDATE

Pursuant to this Court's December 10, 2024 Order (ECF No. 30), Plaintiffs Ciara Noakes, Latifah Abednego, Lucinda O'Dea, Ellen Painter, Robert Hightower, Holly Grossenbacher, And Jennifer Snow (together, "Plaintiffs") and Defendant L'Oreal USA, Inc. ("Defendant")

(collectively, “the Parties”) submit the following Joint Statement regarding the status of the motion to consolidate and the motions to transfer.

1. On December 10, 2024, the Court entered an Order staying the *Noakes, Abednego*, and *O'Dea* actions pending the issuance of the last transfer order in other jurisdictions relating to the *Painter, Grossenbacher*, and *Snow* actions.

2. *Painter v. L'Oreal USA, Inc.* was transferred from District of Hawaii (Case No. 1:24-cv-00512-MWJS-KJM) to the Southern District of New York on February 20, 2025. It was assigned case number 1:25-cv-01497 and referred to Your Honor on April 15, 2025. Your Honor accepted the case as related on April 16, 2025. On April 17, 2025, Your Honor stayed *Painter* pending resolution of the pending motion to transfer in *Snow v. L'Oreal USA, Inc.*, Case No. 1:24-cv-00110-MWJS (D. Hawaii).

3. Also, on February 20, 2025, *Grossenbacher v. L'Oreal USA, Inc.* was transferred from the District of Louisiana to this District. It was assigned case number 1:25-cv-01497 and referred to Your Honor on February 21, 2025. Your Honor stayed *Grossenbacher* pending resolution of the pending motion to transfer in *Snow v. L'Oreal USA, Inc.*, Case No. 1:24-cv-00110-MWJS (D. Hawaii).

4. Defendant's motion to transfer the *Snow* matter to this Court was granted on April 23, 2025. It was assigned case number 1:25-cv-03583 and referred to Your Honor on April 30, 2025. Your Honor accepted that case as related on May 1, 2025.

5. On March 21, 2025, Plaintiff Marilyn Silva filed a related putative class action in the District of New Jersey, styled *Silva v. L'Oreal USA, Inc.*, 3:25-CV-0207-MAS-TJB. Plaintiff has not consented to a voluntary transfer to this Court, and Defendant intends to file its motion to transfer that case to this Court by May 16, 2025.

6. Given the duration that the above-captioned matters have been pending and the potential that other cases may continue to be filed in other jurisdictions, the Parties respectfully request that the Court unstay the *Noakes, Abednego, O'Dea, Painter*, and *Grossenbacher* cases, and order that Plaintiffs file a motion for consolidation of the related cases within 14 days of the Court lifting all stays.

7. Plaintiffs are presently discussing potential leadership structures, and intend to submit one or more motions for appointment of interim class counsel concurrent with their motion to consolidate.

DATED: May 5, 2025

Respectfully Submitted,

FARELLA BRAUN + MARTEL LLP

By: /s/ Thomas Mayhew
Thomas Mayhew

One Bush Street, Suite 900
San Francisco, California 94104
Telephone (415) 954-4400
tmayhew@fbm.com

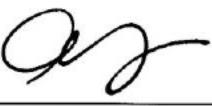
Attorneys for Defendant L'OREAL USA, INC.

The Court intends to consolidate these six related cases. By **May 21, 2025**, the parties shall register any opposition to consolidation. By that same date, Plaintiffs shall move for appointment of interim class counsel. If Plaintiffs file competing motions for appointment of interim class counsel, they may file opposition papers by **May 28, 2025**.

The Court LIFTS the stay in case numbers 24 Civ. 2735, 24 Civ. 3998, 24 Civ. 8352, 25 Civ. 1497, and 25 Civ. 3137.

SO ORDERED.

Dated: May 7, 2025
New York, New York


ANALISA TORRES
United States District Judge